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NORCA INDUSTRIAL, LLC
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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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13 NORCA INDUSTRIAL, LLC, a New York)
Limited Liability Company,)

14)
15 Plaintiff,)
16 v.)

17 ROBERT WREN, an individual; PRIMROSE)
METALS, INC., a California corporation;)
18 RICHARD RAYBIN, an individual; LIFETIME)
CAPITAL GROUP, an unknown entity;)
19 VICTORIA PICLOTTI, an individual;)

20 Defendants.)
21)
22)
23)

CASE NO. C 07 3425 WHA

**SUPPLEMENTAL
DECLARATION OF ROBERT
BLUMENKRANTZ IN SUPPORT
OF PLAINTIFF'S EX PARTE
APPLICATION FOR
TEMPORARY RESTRAINING
ORDER, PRELIMINARY
INJUNCTION AND EXPEDITED
DISCOVERY**

Date: July 3, 2007
Time: 3:30 p.m.
Ctmm: Hon. William H. Alsup

24 ROBERT BLUMENKRANTZ declares:

25 1. I am a vice president of plaintiff Norca Industrial LLC, a New York limited
26 liability company (hereafter "Norca") and have been since before the time that Robert Wren
27 joined Norca. The facts stated in this declaration are based upon my personal knowledge.
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1 2. I have reviewed Robert Wren's declaration dated July 2, 2007 filed in opposition
2 to Norca's application for a temporary restraining order and preliminary injunction. Although I
3 disagree with many of Mr. Wren's assertions made in his declaration, I will only specifically
4 address those noted below.

5 3. The implication in paragraphs 4 and 5 of Mr. Wren's declaration that the
6 purported "\$22 Million book of business" he moved to Norca included boiler tube business is
7 untrue. The "book of business" he brought to Norca involved stainless steel and aluminum bar
8 products, and other tube products not including boiler tubes. The boiler tube business first arose
9 and was developed while Mr. Wren was employed by Norca. Mr. Wren did not move anything
10 like \$22 Million in business to Norca. His base of business quickly evaporated due to dumping
11 suits against bar products and the change in ownership of an aluminum mill in Korea.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct.

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15 Executed on: July 3, 2007

16 Robert Blumenkrantz
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